

Laura M. Egerman, Esq.
McCalla Raymer Leibert Pierce, LLC
485F US Highway 1 S, Suite 300
Iselin, NJ 08830
Telephone: (732) 902-5399
NJ_ECF_Notices@mccalla.com
Attorneys for Secured Creditor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Case No. 22-14193-CMG
Jagmohan Vasudeva and Meena Vasudeva,	Chapter 13
Debtors.	Hearing Date: November 15, 2023 at 9 a.m.
	Judge: Christine M. Gravelle

**ATTORNEY CERTIFICATION ADVISING SECURED CREDITOR HAS NO
OBJECTION TO DEBTOR'S MOTION PURSUANT TO SECTION 363(B) AND (F) OF
THE BANKRUPTCY CODE AUTHORIZING AND APPROVING THE SALE OF
PROPERTY, FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND
INTERESTS WITH PROCEEDS TO ATTACH TO ALLOWED SECURED CLAIMS**

NewRez LLC d/b/a Shellpoint Mortgage Servicing, LLC ("Secured Creditor"), by its counsel, McCalla Raymer Leibert Pierce, LLC, states the following grounds as a response to Jagmohan Vasudeva and Meena Vasudeva's ("Debtors") Motion Pursuant to Section 363(b) and (f) of the Bankruptcy Code Authorizing and Approving the Sale of Property, Free and Clear of all Liens, Claims, Encumbrances and Interests with Proceeds to attach to Allowed Secured Claims (**ECF No. 95**) (the "Motion"):

1. Secured Creditor holds a perfected mortgage lien on Debtors' real property; the property commonly known as 6 Mimi Drive, Monroe Township, New Jersey 08831 (the "Property"). On February 7, 2003, Debtors executed a promissory note in favor of America's Wholesale Lender in exchange for a loan in the original sum of \$300,000.00. As security for the

loan, Borrower and Debtor executed a mortgage in favor of America's Wholesale Lender consenting to a mortgage lien being placed on the Property. The loan was subsequently assigned to Secured Creditor. Secured Creditor filed a proof of claim in this matter on the Claims Register as claim #7-1 evidencing the loan's history, prepetition arrears in the amount of \$111,128.19 and a total claim of approximately \$403,761.79.

2. On October 23, 2023, Debtors filed the Motion seeking to sell the Property for the sum of \$910,000.00, which is returnable on November 15, 2023. (ECF No. 95).

3. Upon information and belief, the total amount needed to payoff Secured Creditor's loan as of November 2, 2023 is approximately \$401,319.48. NOTE: Debtors may not rely upon this amount as a payoff of Secured Creditor's lien.

4. Secured Creditor has no objection to the proposed sale of the Property pursuant to Section 363 of the Bankruptcy Code provided that Secured Creditor's lien attaches to the proceeds of the sale, and provided that the proceeds from the proposed sale are sufficient to (a) pay Secured Creditor's loan in full, which is due and owing as of the closing on the Property with all subsequent fees and interest due thereupon, or (b) as otherwise agreed in writing by Secured Creditor.

5. Additionally, the balance of what is due and owing as of the date of closing must be paid at closing from the proceeds of the sale of the Property. In the event that less than the full amount is to be tendered at closing, such short sale is subject to Secured Creditor's review and approval.

6. If the aforementioned requests are addressed, Secured Creditor files this Certification to ensure that Secured Creditor's claim will be paid in full at closing, to advise that it otherwise has no objection to the Motion, to inform the Court and parties to the sale that

Secured Creditor is aware of the proposed sale and that the Motion may be granted without the need for appearances.

Dated: November 9, 2023

McCalla Raymer Leibert Pierce, LLC
Attorneys for NewRez LLC d/b/a Shellpoint
Mortgage Servicing, LLC

/s/Laura Egerman
By: Laura M. Egerman, Esq.

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CERTIFICATION OF SERVICE

1. I, LaRissia Johnson:
 - o represent the _____ in the above-captioned matter.
 - o am the secretary/paralegal for McCalla Raymer Leibert Pierce, LLC who represents the Secured Creditor.
 - o am the _____ in the above case and am representing myself.
2. On November 7, 2023, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below:
 - **ATTORNEY CERTIFICATION ADVISING SECURED CREDITOR HAS NO OBJECTION TO DEBTOR'S MOTION PURSUANT TO SECTION 363(B) AND (F) OF THE BANKRUPTCY CODE AUTHORIZING AND APPROVING THE SALE OF PROPERTY, FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS WITH PROCEEDS TO ATTACH TO ALLOWED SECURED CLAIMS**
3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

November 9, 2023

Date

/s/ LaRissia Johnson

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Name of Electronic Filing (NEF) <input type="checkbox"/> Other NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)
Jagmohan Vasudeva 6 Mimi Drive Monroe, NJ 08831 Meena Vasudeva 6 Mimi Drive Monroe, NJ 08831	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Name of Electronic Filing (NEF) <input type="checkbox"/> Other NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)
Eugene D. Roth Law Office of Eugene D. Roth Valley Pk. East 2520 Hwy 35, Suite 307 Manasquan, NJ 08736	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Name of Electronic Filing (NEF) <input type="checkbox"/> Other NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other: NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.